

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
AT NASHVILLE**

TRAVIS TIDWELL,)	
)	
Plaintiff,)	
)	
v.)	Case No. 3:22-cv-00150
)	Judge Aleta A. Trauger
RYAN UPCHURCH, professionally known)	
as UPCHURCH,)	
)	
Defendant.)	

**DEFENDANT RYAN UPCHURCH'S MOTION TO AMEND
ANSWER TO COMPLAINT TO ADD COUNTER-COMPLAINT**

Comes now Defendant Ryan Upchurch, by and through undersigned counsel, and pursuant to Federal Rules of Civil Procedure 15(a)(2), and respectfully moves this Court for an Order allowing Mr. Upchurch to amend his Answer to the Complaint (Doc. No. 13) to add the counterclaims contained in the Amended Answer and Counter-Complaint attached hereto as Exhibit A. In support of this Motion, Mr. Upchurch would show that:

1. This Court entered an Initial Case Management Order (Doc. No. 20) setting the deadline for all Motions to Amend on or before January 31, 2023.
2. The attached Counterclaims are compulsory pursuant to Federal Rules of Civil Procedure 13(a)(1)(A).
3. Undersigned counsel has conferred with opposing counsel who states that Mr. Tidwell has no position on this Motion.

For the above reasons, Mr. Upchurch respectfully moves this Court for an Order allowing him to amend his Answer to add the counterclaims contained in the Amended Answer and Counter-Complaint attached hereto as Exhibit A.

Respectfully Submitted,

Sherwood Boutique Litigation, PLC

By: /s/ Cynthia A. Sherwood
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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing has been served on the following via
the Court's CM/ECF system to:

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on this the 31st day of January 2023.

/s/ Cynthia A. Sherwood